

*New Jersey*  
**ALLIANCE for ACTION INC.<sup>®</sup>**

PHILIP K. BEACHEM  
*President*

P.O. Box 6438 • Raritan Plaza II • Edison, New Jersey 08818-6438  
(732) 225-1180 • FAX (732) 225-4694  
www.allianceforaction.com

GERALD T. KEENAN  
*Executive Vice President*  
CLIFFORD HEATH  
*Senior Vice President*

March 18, 2013

Judith A. Enck  
Regional Administrator  
U.S. Environmental Protection Agency, Region 2  
290 Broadway  
New York, NY 10007-1866

Dear Regional Administrator Enck:

On behalf of the hundreds of companies and thousands of employees of member companies that we represent in the State of New Jersey, the New Jersey Alliance for Action is writing to you today to state our opposition to the U.S. Environmental Protection Agency's (EPA) Focused Feasibility Study (FFS).

The New Jersey Alliance for Action is a non-profit, non-partisan statewide coalition of more than 2,500 business, labor, professional, academic and government leaders. The Alliance is an advocate of investment in infrastructure for New Jersey's economy, environment and quality of life. Since our creation in 1974, we have worked closely with each New Jersey Governor, the Cabinet, the Legislature and local government as well as our members to create funding and secure permits for road, bridge and rail improvements, water projects, school construction, aviation enhancements, shore preservation, business expansion and other key infrastructure investments.

We are opposed to the FFS at this time because of a number of reasons:

- While the FFS has not been released yet, we understand that the EPA would prefer to implement a full bank-to-bank dredging of the lower eight miles of the River. We would like to understand the EPA's plans for removal of 11 million cubic yards of sediment from the River and how it will deal with the tremendous amount of long-term disturbance and inconvenience that a project of this scale would cause for employees and businesses in Northern New Jersey. We believe that a large scale dredging project would likely mean more than 20 years of disruption and increased traffic congestion for businesses and employees in Passaic, Essex, Hudson and Bergen counties.
- The FFS will only address the lower eight miles and will do nothing to address the upper 9 miles of the River, putting many communities like Garfield, Passaic, Clifton and Wallington at a disadvantage.
- We believe the EPA should allow the Lower Passaic River Study Area Cooperating Parties Group (CPG) to finish work on the Remedial Investigation/Feasibility Study (RI/FS) prior to the approval of a final remedy for the Lower Passaic River. Since 2007, the CPG has gathered thousands of samples from the River and spent millions of dollars to identify the extent of contamination in the Lower Passaic River. We are concerned with the EPA moving forward with an FFS for the lower eight miles of the River as data collected of

COUNTY ALLIANCES

*Atlantic • Bergen • Burlington • Camden • Essex • Gloucester • Hudson • Mercer • Middlesex • Monmouth • Morris • Ocean • Somerset*

FOIA\_06476\_0002376\_0001

the full 17 miles of the Lower Passaic River during the RI/FS will be rendered useless and millions of dollars will have been wasted.

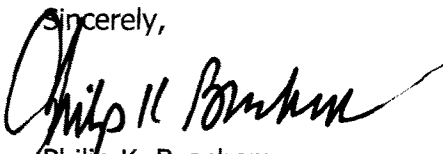
- The FFS will not address ongoing pollution that continues to enter the River each day. We believe it is important to develop programs and projects that can effectively address stormwater runoff, discharges from combined sewer outflows and other sources. These projects not only have environmental benefits for the River, but also economic benefits to the New Jersey workforce.
- We believe that the EPA has not explored all possible remedies for the Lower Passaic River and should work with the Lower Passaic River Study Area Cooperating Parties Group (CPG) on a cost-effective and common sense remedy that would address contamination in the full 17 miles of the Lower Passaic River.

We were briefed recently by the CPG about a proposal to clean up the River called the Sustainable Remedy. We think this is the right approach for the River as:

- the most highly contaminated sediment would be removed from the River in a quicker time period;
- it will address contamination throughout the full 17 miles of the Lower Passaic and benefits all communities that share their borders with the River;
- it will include important community projects – projects that could possibly be developed and constructed by Alliance for Action members and union workers – that will reduce ongoing pollution that continues to enter the River each day.

I respectfully request that the EPA consider the Sustainable Remedy as an alternative remedy prior to the release of the FFS.

Sincerely,



Philip K. Beachem  
President

2013 MAY 19 AM 11:13  
REGION 2  
CORRESPONDENCE  
CONTROL OFFICE